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March 12, 2013

VIA ECF

Honorable Lois Bloom
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Marcos Castro v. The City of New York, et al.
10 Civ. 2322 (JG)

Your Honor:

I represent plaintiff Marcos Castro in the above-referenced matter. I write jointly with Assistant Corporation Counsel Brian Farrar, counsel for the defendants, in requesting a two-month enlargement of time, or until May 15, 2013 to complete discovery. This is the third such request, with the prior two requests having been granted.

Discovery in this case is currently scheduled to close on March 15, 2013. It was extended to that date for various reasons, including the unavoidably delayed processing of Mr. Farrar's request for the audio recordings of the interviews conducted by the Civilian Complaint Review Board during the course of its investigation of the complaint made by plaintiff in connection with the incident giving rise to this lawsuit. As a result of the damage done by Hurricane Sandy, there was a significant backlog in processing this request. I am now informed by Mr. Farrar— who is currently on trial before Judge Korman in the case of *Fernandez v. Sacco, et al.*, 10 Civ. 1624— that he has finally received the recordings and will be duplicating and providing the same to me as soon as practicable.

The defendant's deposition of plaintiff has been completed as well as the bulk of "paper discovery." However, there are 11 individual defendants in this case. Although plaintiff does not anticipate conducting deposition of all of these defendants, he will need

adequate time to review the audio recordings and to schedule and conduct those deposition he chooses to do.

If this request is granted, it was also affect the Court's order that "any request for a pre-motion conference shall be filed in accordance with Judge Gleeson's Individual Motion Practices by March 29, 2013" The parties thus propose that this date be extended until two weeks after the close of discovery, or May 29, 2013.

Thank you for you consideration to this matter.

Respectfully submitted,

/s/

Darius Wadia

Copy (Via ECF): Mr. Brian Farrar
Assistant Corporation Counsel